

PHILLIP A. TALBERT  
United States Attorney  
JUSTIN L. LEE  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
  
Attorneys for Plaintiff  
United States of America

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
EDGAR JIMENEZ,  
  
Defendant.

CASE NO. 2:23-CR-00007-TLN  
2:18-CR-00010-TLN

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL  
ACT; FINDINGS AND ORDER

DATE: May 4, 2023  
TIME: 9:30 a.m.  
COURT: Hon. Troy L. Nunley

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and  
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on May 4, 2023.
2. By this stipulation, defendant now moves to continue the status conference until July 27, 2023, at 9:30 a.m., and to exclude time between May 4, 2023, and July 27, 2023, under Local Code T4. In addition, the parties jointly request to continue the related Admit/Deny Hearing currently set for May 4, 2023, to July 27, 2023, so that both matters may be resolved together.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with

1 this case includes audio and video recordings of undercover drug transactions, law  
2 enforcement reports, and cellular telephone extractions. All of this discovery has  
3 been either produced directly to counsel and/or made available for inspection and  
4 copying.

5 b) Counsel for defendant desires additional time consult with her client,  
6 review the charges, review the discovery, conduct defense investigation, discuss  
7 potential resolution options, and otherwise prepare for trial.

8 c) Counsel for defendant believes that failure to grant the above-  
9 requested continuance would deny her the reasonable time necessary for effective  
10 preparation, taking into account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by  
13 continuing the case as requested outweigh the interest of the public and the  
14 defendant in a trial within the original date prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18  
16 U.S.C. § 3161, et seq., within which trial must commence, the time period of May 4,  
17 2023 to July 27, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. §  
18 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted  
19 by the Court at defendant's request on the basis of the Court's finding that the ends  
20 of justice served by taking such action outweigh the best interest of the public and  
21 the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 2, 2023

PHILLIP A. TALBERT  
United States Attorney

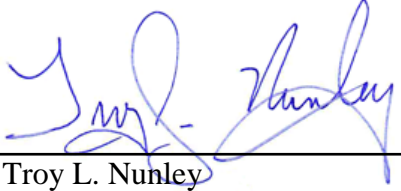
/s/ JUSTIN L. LEE  
JUSTIN L. LEE  
Assistant United States Attorney

Dated: May 2, 2023

/s/ TAMARA SOLOMAN  
TAMARA SOLOMAN  
Counsel for Defendant  
EDGAR JIMENEZ

**ORDER**

IT IS SO FOUND AND ORDERED this 2<sup>nd</sup> day of May, 2023.

  
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Troy L. Nunley  
United States District Judge